

CP:LMN/MBM

F.# 2007R00297/OCDETF# NY-NYE-0503

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

LUIS BENITEZ,
[REDACTED]
KENNETH CHONG,
[REDACTED] and
DINO KALLENKOS,S U P E R S E D I N G
I N D I C T M E N TCr. No. 07-107 (S-5) (ARR)
(T. 21, U.S.C., §§
841(a) (1),
841(b) (1) (A) (ii) (II),
841(b) (1) (B) (ii) (II) and
846; T. 18, U.S.C., §§
2 and 3551 et seq.

Defendants.

- - - - -X

THE GRAND JURY CHARGES:

COUNT ONE

In or about and between January 2004 and January 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LUIS BENITEZ, [REDACTED] KENNETH CHONG, [REDACTED] and DINO KALLENKOS, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance, in violation Title 21, United States Code, Section 841(a) (1).

(Title 21, United States Code, Sections 846 and 841(b) (1) (A) (ii) (II); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO

On or about and between May 1, 2006 and September 1, 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LUIS BENITEZ, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THREE

In or about November 2006, within the Eastern District of New York and elsewhere, the defendant DINO KALLENKOS, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance,

which offense involved five hundred grams or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II); Title 18, United States Code, Sections 2 and 3551 et seq.)

A TRUE BILL

FOREPERSON

BENTON J. CAMPBELL
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK